

DOCKET FILE COPY ORIGINAL

Law Office of  
Richard A. Finnigan  
2405 Evergreen Park Drive SW  
Suite B-3  
Olympia, Washington 98502  
(360) 956-7001  
Fax (360) 753-6862

Kathy McCrary  
Paralegal

RECEIVED

SEP 19 2001

FCC MAIL ROOM

---

September 13, 2001

Magalie Salas, Secretary  
Federal Communications Commission  
445 12th Street SW  
Room TWB204  
Washington, DC 20554  
Attn: Accounting and Audit Division

Re: In the Matter of M&L Enterprises, Inc., d/b/a Skyline Telephone  
Company Petition for Waiver of Sections 36.611, 36.612 and  
69.2(hh) of the Commission's Rules – Docket No. CC 96-45/DA 01-  
1414

Dear Ms. Salas:

Pursuant to a discussion on August 23, 2001 with FCC staff, a letter has been submitted to FCC staff, copy attached. The letter constitutes the entire substance of the most recent "Permit but Disclose" ex parte presentation. Please see our prior letter on this matter of August 27, 2001 which disclosed the oral discussion and included a summary of that discussion. Pursuant to the Commission's rules, a copy of this letter and the attachment are included.

Sincerely,

*Richard A. Finnigan* /km  
RICHARD A. FINNIGAN

RAF/sle  
Enclosures  
cc: Lane Williams

No. of Copies rec'd 07  
List ABCDE

---

# M & L ENTERPRISES, INC.

P.O. BOX 35  
MIDVALE, IDAHO 83645  
208-355-2211

June 20, 2000

RECEIVED

SEP 19 2001

FCC MAIL ROOM

Carole Washburn, Secretary  
Washington Utilities and Transportation Commission  
1300 S. Evergreen Park Drive, SW  
Olympia, Washington 98504-7250

Dear Ms. Washburn:

With this letter M&L Enterprises seeks to register in the state of Washington as a local Exchange Carrier. At this time we are filing tariff sheets with customer and access rates only. A full set of tariffs will be filed with the Commission at least 30 days prior to providing service.

M&L Enterprises also seeks to withdraw Part C, Competitive Classification and Part D, Price Lists from the Application and Petition. We also request a waiver of WAC 480-121-010 (which requires submission of a price list, and petition for competitive classification at the time of registration). This request is being made because M&L Enterprises will be the sole provider of service to many of its customers.

M&L also requests Less than Statutory Notice approval of the tariff sheets because of the time frames imposed on construction by Okanogan County. In order to have an opportunity to complete construction by Oct. 15<sup>th</sup>, M&L will have to complete a loan process and order materials for construction for an early delivery.

If you have any questions or if I may provide you with additional information, please feel free to contact me by telephone or e-mail

Respectfully submitted,

Lane R. Williams,  
President

In the matter of the Application and Petition of )  
M & L Enterprises for registration as an )  
Local Exchange Carrier in the State )  
Of Washington )  
.....)

RECEIVED  
SEP 19 2001  
FCC MAIL ROOM

Application is hereby made by **M&L Enterprises**, to the Washington Utilities and Transportation Commission for an order authorizing its registration as a telecommunications company and approval of its price list. The following general information and specific exhibits are furnished in support thereof:

## GENERAL INFORMATION

### 1. APPLICANT

Company Name: M&L Enterprises  
Applicant Name: Lane R. Williams  
Phone Number: (208) 355-2211  
Fax Number: (208) 355-2222  
Consumer Complaint #: (800) 462-4523

### 2. BUSINESS (MAILING) ADDRESS:

M&L Enterprises  
PO Box 35  
Midvale, ID 83645

### 3. NAME AND ADDRESS OF REGISTERED AGENT:

Ms. Barbara Blunt  
3002 11<sup>th</sup> Ave West  
Seattle, Washington 98119

### 4. FORM OF CORPORATION:

"S" Corporation incorporated in the State of Idaho

### 5. CORPORATE SHAREHOLDERS

Name	Address	Shares owned	% of shares	% of voting contr
Lane R. Williams	POBox 35 Midvale ID 83645	200	50%	50%
Mary Williams	POB 35 Midvale ID 83645	200	50%	50%

### 6. DESCRIPTION OF PROPERTY OWNED BY APPLICANT: None

**7. OFFICERS AND DIRECTORS OF APPLICANT:**

<u>Name</u>	<u>Title</u>	<u>Address</u>
Lane R. Williams	President	PO Box 35, Midvale ID 83645
Mary G. Williams	Sec./Treas	PO Box 35, Midvale ID 83645

**8. AFFILIATED INTERESTS OF APPLICANT:** (Holder of 5% or more of the voting securities of the applicant. Please attach and mark as Attachment 1 any management agreements between applicant and its affiliates.) N/A

**9. SUBSIDIARIES OWNED OR CONTROLLED BY APPLICANT:**

NONE

**EXHIBIT A**

Applicant intends to provide local telephone service and to provide access to long distance/toll services through agreements with interexchange carriers for both in state and interstate calling. The applicant anticipates that it will provide billing and collection services to some interexchange carriers.

Rates for local services are attached to this application along with access charges that the applicant will charge carriers for connection to its local network.

**EXHIBIT B**

Applicant intends to collect deposits for service in situations where customer provides no credit references or customer has bad credit references. Applicant will provide any Bond required by the commission when requested.

**EXHIBIT C**

Long distance services will be provided through Interexchange carriers depending on the choices made by the customers. Applicant will not be setting rates for Long distance service.

**EXHIBIT D**

See attached financials

EXHIBIT E

See attached Business Plan and financials

EXHIBIT F

See attached Financials

EXHIBIT G

N/A

EXHIBIT H

Service will be provided by installing a Mitel Digital Central Office Switch. Cable plant will consist of a fiber backbone and copper distribution cable. Connections to Oroville and Tonasket will be by fiber optic cable.

EXHIBIT I

N/A

EXHIBIT J

Applicant is in compliance with all applicable federal, state and local telecommunications technical and business regulations.

EXHIBIT K

See attached business plan.

## EXHIBIT A

M&L ENTERPRISES  
WASHINGTON  
LOCAL ACCESS TARIFF  
1999

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

name of utility  
M&L ENTERPRISES

Original Sheet No. 22

Cancels        Sheet No.       

NETWORK ACCESS LINE SERVICE

RATES

MONTHLY RATES

Access Lines

Residence (R-1) Business (B-1)

Local Service

\$19.50

\$25.00

CONDITIONS

The above rates apply to the provision of network access lines which, when connected to a suitable telephone instrument provides access to the telephone network.

Instruments must be provided by the subscriber, subject to the conditions described in the Connection With Subscriber-Owned Equipment portion of this tariff.

Additional instruments may be attached to network access lines. The Company reserves the right to limit the number of instruments connected to an access line if they cause interference with the normal operation of the line.

Tone Dial service is provided where the facilities are available.

Issue Date:                       
Docket No.                     

Effective Date: 6-29-00

By Lane Williams  
Manager





WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
name of utility  
M&L ENTERPRISES

Original Sheet No. 30

Cancels        Sheet No.       

## SERVICE CONNECTION, MOVE AND CHANGE CHARGES

### RATES

	<u>Business</u>	<u>Residence</u>
Service Order	\$10.00	\$10.00
Line Connection	\$15.00	\$15.00
Premise Visit	\$40.00	\$40.00

### CONDITIONS

These charges are intended to cover the expense incurred by the Company in conjunction with the following:

- Establishment of service;
- Change in location of a service to other premises;
- Transfer of service from one customer to another;
- Change of telephone number at customer's request;
- Installation of auxiliary equipment;
- Restoral of service disconnected for nonpayment or failure to establish credit.

Charges shown are in addition to installation charges shown under other Tariff schedules.

Charges shown in this schedule are based on work being performed during regularly scheduled working hours of the Company's employees. Work performed with overtime labor costs will be performed at direct cost to the customer.

No charges will apply under the following circumstances:

Service to which no monthly rates apply;

Public telephones installed at the initiative or option of the Company.

Issue Date:                       
Docket No.                     

Effective Date: 6-29-00  
By Lane Williams  
Manager

## OFF-PREMISE EXTENSION SERVICE

## RATES

	Installation Charge	Monthly Rate
Continuous Property	Actual Cost	No Charge
Continuous Property - Additional Network Interface	Applicable Non-Recurring Charges	\$4.00
Non-Continuous Property Each Location	Applicable Non-Recurring Charges	Applicable Access Line Rate

## CONDITIONS

Off-premise extension service, where the extension is located in a different building on the same continuous property as the main access line termination, may be installed by the Company. The installation charge will be negotiated between the subscriber and the Company. The subscriber is responsible for the maintenance of any subscriber owned wiring. No recurring monthly charge will apply in this situation.

Continuous property extensions are defined as those where the drop to the additional access point comes directly from the premises of the main access line termination and does not come out of the distribution cable.

Continuous property extensions requiring an additional network interface are defined as those where the drop to the additional access point comes out of the distribution cable and requires an additional network interface.

When off-premise extension service is provided on Non-Continuous property, each location is treated as an access line termination and the applicable access line rates will apply at each location. Installation will be performed based on all applicable Non-Recurring service connection elements.

Issue Date: \_\_\_\_\_  
Docket No. \_\_\_\_\_

Effective Date: 6-29-90

By Lane Williams  
Manager



WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION  
name of utility  
M&L ENTERPRISES

Original Sheet No. 36

Cancels        Sheet No.       

INTRAEXCHANGE SPECIAL ACCESS

RATES


	<u>Installation</u>	<u>Monthly</u> <u>Rate</u>
Per Channel Termination	Actual Cost	Business Access Line Rate

CONDITIONS

The Company will furnish and maintain Special Access, where facilities are available and within the Exchange Area, for communication between stations not connected to the telephone network.

The channel terminal rate will apply for each termination within the exchange area.

Issue Date:                       
Docket No.                     

Effective Date: 6-29-00  
By Lane Williams   
Manager

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

name of utility

M&L ENTERPRISES

Original Sheet No. 37

Cancels \_\_\_\_\_ Sheet No. \_\_\_\_\_

DIRECTORY ASSISTANCE SERVICE

RATES

Per each Directory Assistance Call

\$ .33

CONDITIONS

1. The above charge will apply to each call to a directory assistance operator requesting information for locations within the state.
2. The charge will apply regardless of whether or not the operator is able to supply the requested information.
3. A maximum of two requests for information will be allowed per directory assistance call.
4. Charges for Directory Assistance are not applicable to calls placed from:
  - Public telephones
  - Semipublic telephones
  - Customers who have a reading, physical or visual handicap and thus are unable to use the directory.
5. In the event a customer obtains directory assistance service through fraudulent means, in addition to any other action authorized by this tariff, the Company may assess appropriate Directory Assistance charges on the customer's regular telephone account.
6. Company will provide directory assistance without charge during regular business hours for telephone numbers not listed in the current directory.

Issue Date: \_\_\_\_\_  
Docket No. \_\_\_\_\_

Effective Date: 6-29-00  
By Lane Williams  
Manager

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

name of utility  
M&L ENTERPRISES

Original Sheet No. 38

Cancels \_\_\_\_\_ Sheet No. \_\_\_\_\_

DIRECTORY LISTINGS

RATES

Monthly  
Rate

Additional or Alternate Listing -	Business	\$1.50
	Residence	1.00
Cross Reference or Duplicate		1.00
Extra Lines, per line		1.00
Non-List		1.00
Non-Publish		2.00
Foreign Exchange		2.00

CONDITIONS

The regulations for directory listings, as provided in this section, apply only to that section of the directory containing the regular alphabetical list of names of subscribers.

Primary Listing

One listing without charge, termed the Primary Listing, is provided as follows:

1. For each separate subscriber service. When two or more main station lines or PBX trunk lines are consecutively operated, the first number of the group is considered the primary listing.
2. For each semi-public service.

Issue Date: \_\_\_\_\_  
Docket No. \_\_\_\_\_

Effective Date: 6-29-00  
By Lane Williams  
Manager

WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION

name of utility  
M&L ENTERPRISES

Original Sheet No. \_\_\_\_\_ 2

Cancels \_\_\_\_\_ Sheet No. \_\_\_\_\_

NETWORK AND ACCESS TOLL SERVICE

<u>Tariff Section</u>	<u>Description</u>	<u>Per Access Minute</u>
<u>Local Transport</u>	<u>Originating</u>	
	Per access minute	\$0.0390
	<u>Terminating</u>	
	Per access minute	\$0.0110
<u>Local Switching</u>	<u>Originating</u>	
	Per access minute	\$0.0190
	<u>Terminating</u>	
	Per access minute	\$0.0110
<u>Switched Access Universal Service Rate</u>	Per Access minute of use:	
	- Terminating	\$0.0850
<u>Switched Access Universal Service Rate Adder</u>		
(for a 5 year period from the start of service)	Per Access minute of use:	
	- Terminating	\$0.1000

Issue Date: \_\_\_\_\_  
Docket No. \_\_\_\_\_

Effective Date: 6-29-00  
By Lane Williams *Lane Williams*  
Manager

## EXHIBITS D,E,F

M&L Enterprises  
Projected Balance Sheet

ASSETS	Year 1		Year 2		Year 3		Year 4		Year 5	
Current Assets										
Cash	\$	56,875	\$	52,140	\$	71,756	\$	95,163	\$	120,879
Receivables	\$	200,000	\$	200,000	\$	200,000	\$	200,000	\$	200,000
Material & Supplies	\$	53,000	\$	53,000	\$	53,000	\$	53,000	\$	53,000
Property, Plant & Equipment										
Plant in Service	\$	-	\$	808,545	\$	807,648	\$	806,706	\$	805,717
Plant Under Construction	\$	808,545	\$	(897)	\$	(942)	\$	(989)	\$	(1,038)
Less Accumulated Depreciation	\$	48,921	\$	97,788	\$	146,597	\$	195,347	\$	244,034
Net Plant	\$	759,624	\$	709,860	\$	660,109	\$	610,370	\$	560,645
TOTAL ASSETS	\$	1,069,499	\$	1,015,000	\$	984,865	\$	958,534	\$	934,524
LIABILITIES										
Current Liabilities	\$	200,000	\$	200,000	\$	200,000	\$	200,000	\$	200,000
Miscellaneous Liabilities	\$	53,000	\$	53,000	\$	53,000	\$	53,000	\$	53,000
Debt	\$	646,836	\$	623,013	\$	597,285	\$	569,498	\$	539,488
TOTAL LIABILITIES	\$	899,836	\$	876,013	\$	850,285	\$	822,498	\$	792,488
EQUITY	\$	161,709	\$	161,530	\$	161,341	\$	161,143	\$	160,936
Retained Earnings	\$	7,954	\$	(22,543)	\$	(26,761)	\$	(25,108)	\$	(18,900)
TOTAL EQUITY	\$	169,663	\$	138,987	\$	134,580	\$	136,036	\$	142,036
TOTAL LIABILITY & EQUITY	\$	1,069,499	\$	1,015,000	\$	984,865	\$	958,534	\$	934,524



M&L Enterprises  
Projected Income Statement

REVENUES	Year 1	Year 2	Year 3	Year 4	Year 5
Local	\$51,203	\$57,093	\$58,628	\$61,559	\$64,637
Interstate Access	\$38,640	\$40,572	\$42,601	\$44,731	\$46,967
State Access	\$73,968	\$77,666	\$81,550	\$85,627	\$89,909
Billing & Collection	\$1,595	\$1,993	\$2,093	\$2,198	\$2,308
Interstate USF	\$0	\$0	\$20,370	\$19,601	\$18,755
State USF	\$0	\$0	\$0	\$0	\$0
Uncollectible	(\$512)	(\$571)	(\$586)	(\$616)	(\$646)
Net Operating Revenues	\$164,893	\$176,754	\$204,655	\$213,100	\$221,929
<b>EXPENSES</b>					
Plant Specific	\$20,954	\$22,002	\$23,102	\$24,257	\$25,470
Network Operations	\$16,477	\$17,301	\$18,166	\$19,074	\$20,028
Depreciation	\$48,921	\$48,867	\$48,810	\$48,750	\$48,687
Customer Operations	\$15,999	\$16,799	\$17,639	\$18,521	\$19,447
General Admin/Other	\$42,768	\$43,243	\$43,659	\$44,008	\$44,283
Property & Operating Taxes	\$6,945	\$7,293	\$7,657	\$8,040	\$8,442
Office Adjustment	\$0	\$0	\$0	\$0	\$0
Total Operating Expenditures	\$152,064	\$155,504	\$159,032	\$162,650	\$166,357
<b>Operating Margin</b>	\$12,829	\$21,250	\$45,622	\$50,450	\$55,572
Other Operating Income & Expense					
Interest Expense	\$0	\$51,747	\$49,841	\$47,783	\$45,560
Net Income Before Taxes	\$12,829	(\$30,497)	(\$4,219)	\$2,667	\$10,012
Income Taxes	\$4,875	\$0	\$0	\$1,013	\$3,805
<b>Net Income</b>	\$7,954	(\$30,497)	(\$4,219)	\$1,653	\$6,208

M&L Enterprises  
Financing Assumptions

			Year 1		Year 2		Year 3		Year 4		Year 5
Loan	rate	term									
1	8.00%	15	\$ 646,836	\$	623,013	\$	597,285	\$	569,498	\$	539,488
2	8.00%	15		\$	-	\$	-	\$	-	\$	-
3	8.00%	15				\$	-	\$	-	\$	-
4	8.00%	15						\$	-	\$	-
5	8.00%	15									
6	8.00%	15									
7	8.00%	15									
8	8.00%	15									
9	8.00%	15									
Total			\$ 646,836	\$	623,013	\$	597,285	\$	569,498	\$	539,488
Annual Interest											
1				\$	51,747	\$	49,841	\$	47,783	\$	45,560
2						\$	-	\$	-	\$	-
3								\$	-	\$	-
4											
5											
6											
7											
8											
9											
Total			\$ -	\$	51,747	\$	49,841	\$	47,783	\$	45,560
Annual Principal											
1				\$	23,823	\$	25,728	\$	27,787	\$	30,010
2						\$	-	\$	-	\$	-
3								\$	-	\$	-
4											
5											
6											
7											
8											
9											
Total			\$ -	\$	23,823	\$	25,728	\$	27,787	\$	30,010
Total Annual Payment											
1			\$ 75,570	\$	75,570	\$	75,570	\$	75,570	\$	75,570
2				\$	-	\$	-	\$	-	\$	-
3						\$	-	\$	-	\$	-
4								\$	-	\$	-
5								\$	-	\$	-
6								\$	-	\$	-
7											
8											
9											
Total			\$ 75,570	\$	75,570	\$	75,570	\$	75,570	\$	75,570
EQUITY											
	20%		\$ 161,709	\$	(179)	\$	(188)	\$	(198)	\$	(208)
Cumulative Equity			\$ 161,709	\$	161,530	\$	161,341	\$	161,143	\$	160,936

## EXHIBIT H

## EXHIBIT K

# M&L Enterprises

---

## 1.0 Executive Summary

This business plan will describe the construction, financial feasibility, and operations of for M&L Enterprises, Inc.

The company will be funded by a combination of personal contribution from the owners, a loan from RTFC, and equipment usage owned by the owners.

Total Investment: \$808,545.00

Gross income \$152,064.00

Net income(\$7,954.00) (first year)

See pro-forma financial information for detailed financial information

## 1.1 Objectives

1. To provide telephone services to people in Fire District #12 in the Mt. Hull area near Oroville, Washington.
2. To offer a variety of communication service to customers.
3. To expand the service area as appropriate and requested.

## 1.2 Mission

TO PROVIDE MODERN DIGITAL COMMUNICATION SERVICES TO INCLUDE, VOICE, DATA, AND VIDEO, WITH THE BEST EQUIPMENT AVAILABLE TO THE INDUSTRY, TO THE RESIDENTS OF FIRE DISTRICT #12 AND ADJACENT AREAS OF OROVILLE AND TONASKET, WASHINGTON

## 1.3 Keys to Success

1. Providing service by October, 2000
2. Providing service economically
3. "Connecting" with local people
4. Having adequate supportive services to serve and maintain records.
5. Hiring people who have a high commitment to customers service.

## 2.0 Company Summary

M&L Enterprises is an Idaho Corporation. It provides construction equipment to its affiliate, Midvale Telephone Exchange, Inc. This document describes M&L's move to not only providing equipment but to owning and operating a small telephone company. In this situation it will provide a full spectrum of Communication services to residents in the rural areas near Oroville and Tonasket, Washington. The company will install the cable, build a switch building, purchase and install a digital switch station, install the drop cables to homes, and make connections to the communities of Oroville and Tonasket via a Fiber Optic Cable. In addition M&L will provide, through a local employee(s) service for the customers of the system. maintenance of company records, provide legal and financial reports as required, and expand the business by offering additional services as possible.

---

# M&L Enterprises

---

## 2.1 Company Ownership

M&L Enterprises is a subchapter S private corporation, incorporated in the State of Idaho. It is owned on a 50/50 basis by Lane and Mary Williams. There is potential to broaden the ownership as this project progresses.

Both of the owners also are part owners of Midvale Telephone Exchange, Inc. (MTE). MTE has provided local telephone service to the Midvale, Idaho community since 1909. The company was purchased by the Williams family in 1943. In 2000, the third generation of that family is assuming management control of the company.

Lane Williams, the present General Manager, assumed management control of the company in 1976 when his parents retired. At that time Midvale served 220 customers in Midvale. Since that time, the company has expanded and added services until in 2000, it provides local telephone service to just over 2000 customers in ten exchanges scattered across the states of Idaho, Oregon, and Arizona. Of those ten exchanges, five were constructed to serve isolated rural unserved residents.

In addition, MTE provides CATV in two of its exchanges and provides Internet access in two others. Mr. and Mrs Williams also have ownership in an affiliated organizations which provides Internet and Toll (long distance) services to customers in the west. The affiliate, Rural Network Services, Inc. serves approximately 2000 long distance customers and 2000 Internet customers.

## 2.2 Start-up Summary

1. Need to have "presence" on site.
2. Need to negotiate an agreement with fire district to lease land for switch building
  - A. Need to survey land owned by fire district
  - B. Need to negotiate a site location
  - C. need to negotiate a financial agreement with the fire district
3. Need to begin process physically by building switch facility.
  - A. Decide between a prefab building and a scratch built
  - B. Secure crew to build building and and septic system
4. Need to "Register" with the State of Washington's transportation and communication commission.
5. Need to develop "Financials" as soon as possible
6. Register in state of Washington as a foreign Corporation to do business in state.

---

# M&L Enterprises

---

## 2.3 Company Locations and Facilities

The switch site for the proposed telephone exchange will be located in Section 21, T.39, R28 located in North/Central Washington State.

## 3.0 Services

The company will provide modern telephone services to residences and businesses to include not only local but extended area service to the communities of Oroville and Tanasket. The extended service is necessary because there is no business community within the exchange boundaries and these two communities serve this function to the residents of the exchange area.

### 3.1 Service Description

M&L will provide the following services directly or through 3rd party contractual arrangements.

1. Basic local telephone service
2. Touch tone service
3. Access to Toll providers
4. Access to emergency services
5. Provision of lifeline and link-up services to low income residents

The company will provide thses services by construction of a telephone plant using fiber optic Cable, a digital switch, and connection to the toll network via digital carrier. All construction methods and equipment to be installed will meet the technical standards established by the Federal Rural Utility Services (formerly REA).

### 3.2 Competitive Comparison

There is no existing telephone service within the exchange boundaries, therefore, no competition.

## 6.0 Management Summary

It is anticipated that there will be one full time employee during the first two years. Year three will require a second employee. There are two owners, Lane R. Williams and Mary G. Williams, who will also serve as managers of the company.

# **M&L Enterprises**

---

## **6.1 Organizational Structure**

The Organizational structure will be very "flat", in that the owners/managers will contract with the affiliate, Midvale Telephone exchange, for management services, billing and collection services, facilities and equipment to provides services, and heavy construction or extensive construction activity. See apendices for illustration of the organizational structures.

## **7.0 Financial Plan**

See the attached financial documents.



Kathy McCrary  
Paralegal

Law Office of  
Richard A. Finnigan  
2405 Evergreen Park Drive SW  
Suite B-3  
Olympia, Washington 98502  
(360) 956-7001  
Fax (360) 753-6862

RECEIVED

SEP 19 2001

FCC MAIL ROOM

---

September 13, 2001

Magalie Salas, Secretary  
Federal Communications Commission  
445 12th Street SW  
Room TWB204  
Washington, DC 20554  
Attn: Accounting and Audit Division

Re: In the Matter of M&L Enterprises, Inc., d/b/a Skyline Telephone  
Company Petition for Waiver of Sections 36.611, 36.612 and  
69.2(hh) of the Commission's Rules - Docket No. CC 96-45/DA 01-  
1414

Dear Ms. Salas:

Pursuant to a discussion on August 23, 2001 with FCC staff, a letter has been submitted to FCC staff, copy attached. The letter constitutes the entire substance of the most recent "Permit but Disclose" ex parte presentation. Please see our prior letter on this matter of August 27, 2001 which disclosed the oral discussion and included a summary of that discussion. Pursuant to the Commission's rules, a copy of this letter and the attachment are included.

Sincerely,

*Richard A. Finnigan /km*  
RICHARD A. FINNIGAN

RAF/sle  
Enclosures  
cc: Lane Williams